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CLERK, U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

BY

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DEPUTY

ANDREW R. LIVINGSTON (State Bar No. 148646)  
alivingston@orrick.com  
ERIN M. CONNELL (State Bar No. 223355)  
econnell@orrick.com  
ORRICK, HERRINGTON & SUTCLIFFE LLP  
The Orrick Building  
405 Howard Street  
San Francisco, CA 94105-2669  
Telephone: +1-415-773-5700  
Facsimile: +1-415-773-5759

Attorneys for Defendants  
Chase Home Finance, LLC (on behalf of itself and as successor  
in interest to Chase Manhattan Mortgage Corporation) and  
James Boudreau

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

Via Fax

Case No. '08 CV 0500 JM RBB

CHRISTOPHER CLARK and JAMES  
RENICK, individuals,

Plaintiffs,

v.

CHASE HOME FINANCE, LLC; a Delaware  
LLC doing business in California; CHASE  
MANHATTAN MORTGAGE  
CORPORATION, a New Jersey corporation  
doing business in California; JAMES  
BOUDREAU, an individual; and DOES 1-25,

Defendants.

DECLARATION OF JAMES  
BOUDREAU IN SUPPORT OF  
DEFENDANTS' NOTICE OF  
REMOVAL

DECLARATION OF JAMES BOUDREAU IN SUPPORT  
OF DEFENDANTS' NOTICE OF REMOVAL

CR

1 I, James Boudreau, hereby declare:

2 1. I am an Applications Developer and a current employee of JP Morgan  
3 Chase Bank. I am also an individually named defendant in this case. I make this declaration in  
4 support of Defendants' Notice of Removal. The facts set forth in this declaration I know to be  
5 true of my own personal knowledge, except where such facts are stated to be based on  
6 information and belief, and those facts I believe to be true. If called as a witness I could and  
7 would testify competently to the matters set forth in this declaration.

8 2. I am a citizen of California.

9 3. I am not (and never have been) a corporate officer or director of Chase  
10 Home Finance, LLC, or of Chase Home Mortgage Corporation when that company was in  
11 existence.

12 4. During the time that Plaintiffs Christopher Clark and James Renick worked  
13 for Chase Home Mortgage Corporation and Chase Home Finance, LLC, I was not their employer.  
14 I did not have decision-making responsibility for the payroll practices and policies that governed  
15 their employment.

16 5. I am not, and have never been, the alter-ego of Chase Home Mortgage  
17 Corporation or Chase Home Finance, LLC. I have never had any commingled funds or other  
18 assets with either Company. I have never taken on liability for the debts of Chase Home  
19 Mortgage Corporation or Chase Home Finance, LLC, and those companies have never taken on  
20 liability for my debts. I am not, and have never been, the equitable owner of Chase Home  
21 Mortgage Corporation or Chase Home Finance, LLC.

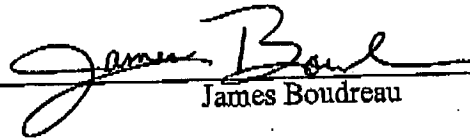
22 6. Although I was an employee of Chase Home Finance, LLC, and of Chase  
23 Home Mortgage Corporation when that company was in existence, I personally have never  
24 employed any of the employees of either Company. I also do not have, and have never had, any  
25 of my own personal officers or directors.

26 7. Neither Chase Home Mortgage Corporation nor Chase Home Finance,  
27 LLC is a mere shell or conduit for my affairs. I am not (and have never been) a majority  
28 shareholder of Chase Home Mortgage Corporation, Chase Home Finance, LLC, JP Morgan

Chase Bank, JP Morgan Chase & Co., or any other parent company to Chase Home Mortgage Corporation or Chase Home Finance, LLC.

Executed on March 17, 2008, in the City of San Diego, State of California.

I declare under penalty of perjury under the laws of the State of California and these United States that the foregoing is true and correct.

  
James Boudreau